

From: [Prosser, Sean](#)
To: [Welsh, Michael](#)
Cc: [Fronk, Casey](#)
Subject: Re: SEC v. Digital Licensing, Inc. et al.
Date: Friday, August 4, 2023 11:13:09 AM
Attachments: [image001.png](#)
[image003.png](#)
[MintzLogo.png](#)

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Thanks - can we plan on today at 2:30pm MDT? You can reach me at my desk number below or let me know where to call you. Thx.

Sean Prosser
Member

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On Aug 4, 2023, at 10:09 AM, Welsh, Michael <WelshMi@sec.gov> wrote:

Sean:

We are free this afternoon from 2:30-4:30pm MT (130-330 PT). Let us know if there is a time within that window that works on your end. Alternatively, we are generally free Monday afternoon.

-Mike

Michael E. Welsh

Trial Attorney
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<image001.png>

<image003.png>

From: Prosser, Sean <STProsser@mintz.com>
Sent: Thursday, August 3, 2023 12:39 PM
To: Welsh, Michael <WelshMi@SEC.GOV>; Fronk, Casey <FronkC@SEC.GOV>
Subject: SEC v. Digital Licensing, Inc. et al.

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Hi. For the past year I've been representing James Franklin and Western Oil in connection with an investigation by the SEC's LA office where we've been fully cooperating with the SEC team. I was shocked to learn that you filed a lawsuit that included James and Western but have never contact him or me for testimony, documents or anything involving your underlying investigation (or even receiving a Wells Notice). Some of the persons and entities you've sued already are being sued by James and he even lodged a complaint against them with the SEC regarding their crypto activities (see attached and below, which we provided to the LA SEC attorneys). Would you have a time tomorrow to discuss this matter? I'm generally free after 10:00 am Pacific.

Sean Prosser
Member

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Begin forwarded message:

From: "Prosser, Sean" <STProsser@mintz.com>
Date: June 7, 2023 at 2:00:10 PM PDT
To: "Blau, Marc J." <BlauM@sec.gov>, "Touny, Dinah" <tounyd@sec.gov>
Subject: **FW: SEC Investor Complaint Form Sent to the SEC against
Schad E Brannon and Digital Licensing, Inc.**

Hi Marc. Further to our prior emails, below is a brief description of what's been going on with this group that initially were members but later seized control of the project and, probably most importantly, are running what appears to

be an ongoing crypto token scheme (“Black Gold Utility Token, <https://www.blackgoldrewards.com/bgld-token>, which Mr. Franklin and Western Oil have nothing to do with despite this group’s reference to Western Oil as a “partner.” I recently learned that Mr. Franklin had submitted a complaint to the SEC and I’ve attached it here. There also is a lawsuit pending (complaint attached) related to the group’s actions related to the well assets, etc. I’ve also included some additional information that Mr. Franklin asked us to provide to you.

<!--[if !supportLists]-->1. <!--[endif]-->Attached is the complaint that Mr. Franklin filed with the SEC regarding the listed persons who became members but then tried to take it over.

<!--[if !supportLists]-->2. <!--[endif]-->Here is a link to information and documents, including a promotional web site that falsely states that the Western Oil Well in Nevada is producing oil. [deleted]

<!--[if !supportLists]-->3. <!--[endif]-->This group also is saying that Western has additional leases in North Dakota which is false as it never owned any leases in any other place other than the state of Nevada. Mr. Franklin has received over 100 telephone calls from buyers of the coin/token asking if this is true.

<!--[if !supportLists]-->4. <!--[endif]-->Also attached is a link to [deleted] related to this group’s scheme involving bringing their coin buyers out to the rig in order to induce them into buying more of the crypto coin.

<!--[if !supportLists]-->5. <!--[endif]-->Mr. Franklin fears the group is trying to implicate him in the scheme, and he has severed all ties and filed suit against them.

I realize this is a fair amount of new information and material to review. Could we plan to discuss it next week? I’m generally available on Wednesday or Thursday. Thank you.

Sean Prosser
Member

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